



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

**FILED**

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Order Instituting Rulemaking to Implement the )  
California Renewables Portfolio Standard )  
Program. )  
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Rulemaking 04-04-026  
(Filed April 22, 2004)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) SUPPLEMENTAL  
COMMENTS IN SUPPORT OF AMENDED PETITION FOR MODIFICATION OF  
D.04-06-014 OF PACIFIC GAS AND ELECTRIC COMPANY AND SOUTHERN  
CALIFORNIA EDISON COMPANY REGARDING STANDARD TERMS AND  
CONDITIONS REQUIRED FOR RENEWABLES PORTFOLIO STANDARD  
CONTRACTS

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DATED: June 19, 2007

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the California Renewables Portfolio Standard Program.	) ) ) ) )	Rulemaking 04-04-026 (Filed April 22, 2004)
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COMMENTS IN SUPPORT OF AMENDED PETITION FOR MODIFICATION OF D.04-06-  
014 OF PACIFIC GAS AND ELECTRIC COMPANY AND SOUTHERN CALIFORNIA  
EDISON COMPANY REGARDING STANDARD TERMS AND CONDITIONS REQUIRED  
FOR RENEWABLES PORTFOLIO STANDARD CONTRACTS**

On June 15, 2007, Pacific Gas and Electric Company (“PG&E”) and Southern California Edison Company (“SCE”) filed an amended petition for modification of D.04-06-014 regarding standard terms and conditions required for renewables portfolio standard (“RPS”) contracts (“Amended Petition”). The Amended Petition includes declarations from PG&E and an RPS developer setting forth many of the commercial difficulties associated with the standard terms and conditions to be used in RPS agreements. In further support of the Amended Petition, SCE submits the following declarations attached hereto as Exhibit 1. Specifically, the declarations set forth the difficulties SCE and an RPS developer, Caithness Corporation, have experienced in connection with the standard terms.

Respectfully submitted,

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/s/ William V. Walsh

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## **Exhibit 1**

## **DECLARATION OF STUART R. HEMPHILL**

I, Stuart R. Hemphill, declare and state

1. I am the Director of Renewable and Alternative Power at Southern California Edison Company ("SCE"). In this position, my responsibilities include oversight and management of the development of power purchase agreements ("PPAs") with counterparties in the business of producing electric energy from renewable energy resources. In carrying out these responsibilities, I have acquired knowledge of SCE's contracts with such sellers and the development of such transactions.

2. Based on my experience and the concerns that renewable sellers have expressed to me and/or to others at SCE, I make the following statements:

a. It is very important for SCE and its counterparties to have flexibility to develop mutually beneficial contract terms in all PPAs. Based on experience with numerous counterparties, only a few contracts terms should be standard: Renewable Energy Credit ("REC"), Green Attributes, and CPUC Approval definitions. This flexibility is necessary to assure that the terms of the PPA meet the varying and evolving needs of renewable energy facilities and their developers and financiers, and the innovative technologies that renewable energy facilities often employ.

b. SCE supports standardizing the definitions of RECs and Green Attributes, to allow for a uniform REC product that can be traded, as well as the definition of CPUC Approval.

c. SCE believes that the standardization of terms (other than the definitions of RECs, Green Attributes, and CPUC Approval), and in particular the restrictions on modification of other terms, has restrained progress on successful completion of RPS contracts, causing undue frustration to both buyers and sellers. SCE believes that these disadvantages outweigh any benefits from standardization of terms other than the definitions of RECs, Green Attributes, and CPUC Approval.

d. SCE has found that non-negotiable terms lead to a more difficult and protracted PPA negotiation for renewable energy facilities.

e. SCE has found that non-negotiable provisions can, and have, made meeting the needs of diverse and developing RPS technologies more difficult.

f. SCE has been informed that non-negotiable terms can make, and have made, financing for some renewable energy projects more difficult and more expensive.

g. SCE has found that negotiations for renewable energy facilities are faster and more efficient if negotiations begin with terms and conditions that are updated to reflect lessons learned from renewable energy contracting experience.

h. SCE has experienced frustration, and has been informed by renewables sellers of their frustration, with the need to incorporate standard terms and conditions that are neither applicable to the RPS contract under development nor commercially justified.

i. SCE has found that the modification to non-negotiable terms and conditions has at times proven necessary to successfully complete RPS contract formation with otherwise desirable renewable energy projects that, based on SCE's solicitation evaluation criteria, appeared to be viable in all other respects.

j. SCE has been informed that time is of the essence in many RPS projects, and has been told that equipment and financing availability for renewables projects is time-sensitive.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct.

Executed on June 18, 2007 at Rosemead, California.

/s/ Stuart R. Hemphill  
Stuart R. Hemphill

## DECLARATION OF Joseph Greco

I, Joseph Greco, declare:

1. I am the Vice President, Western Region of Caithness Corporation, and I make this declaration in support of the Amended Petition for Modification with respect to the Standard Terms and Conditions for power purchase agreement contracts ("PPAs") with renewable energy facilities intended to contribute towards California's Renewables Portfolio Standard ("RPS").

2. Caithness Corporation is an affiliate of four entities which have recently signed new Renewable Power Purchase Agreements, ( Coso Clean Power, Caithness 251 Wind LLC, Ridgetop Energy LLC and Caithness Dixie Valley LLC ) and has many years of experience in developing and operating renewable energy facilities. I have experience in negotiating PPAs, including experience in negotiating PPAs for renewable energy facilities to contribute towards California's RPS program.

3. Based on my experience, and the experience of Caithness Corporation, I make the following statements:

a. It is very important for renewable energy facility developers to have flexibility to negotiate all PPA terms. This flexibility is often necessary to assure that the terms of the PPA meet the varying and evolving needs of the facilities and their developers and financiers, and the innovative technologies that renewable energy facilities often employ.

b. Caithness Corporation understands the need to standardize the definitions of RECs and Green Attributes, to allow for a uniform REC product that can be traded. We do not support standardizing and eliminating any possibility for negotiating terms and conditions, other than the definitions of RECs, Green Attributes, and CPUC Approval.

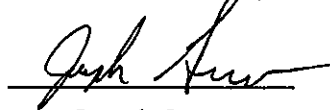
c. Non-negotiable terms can lead to a more difficult and protracted PPA negotiation for renewable energy facilities. The rigidity of non-negotiable terms makes conforming PPAs to the needs of developers and financiers much more difficult, and trying to meet those needs in the context of non-negotiable terms and conditions consumes a significant amount of time, diverting resources from the work needed to finalize RPS PPAs.

d. Non-negotiable terms can make financing for renewable energy projects more difficult and more expensive.

e. PPA negotiations for renewable energy facilities should be faster and more efficient if negotiations begin with terms and conditions that are updated to reflect lessons learned from renewable energy contracting experience.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct.

Executed on June 18, 2007



Joseph Greco  
Vice President Western Region

## **CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) SUPPLEMENTAL COMMENTS IN SUPPORT OF AMENDED PETITION FOR MODIFICATION OF D.04-06-014 OF PACIFIC GAS AND ELECTRIC COMPANY AND SOUTHERN CALIFORNIA EDISON COMPANY REGARDING STANDARD TERMS AND CONDITIONS REQUIRED FOR RENEWABLES PORTFOLIO STANDARD CONTRACTS on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **19th day of June, 2007**, at Rosemead, California.

/s/ Sara Carrillo

Sara Carrillo

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Tuesday, June 19, 2007

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